

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IRON MOUNTAIN INCORPORATED;
IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.; C. RICHARD
REESE; JOHN F. KENNY, JR.; GARRY
B. WATZKE; LARRY L. VARN; and
CHARLES G. MOORE,

Plaintiffs and
Counterclaim-Defendants,

v.

THOMAS CARR,

Defendant and
Counterclaim-Plaintiff.

CIVIL ACTION
NO. 05 10890 RCL

**ASSENTED-TO MOTION TO EXTEND DEADLINE
TO RESPOND TO MOTION FOR DISQUALIFICATION OF COUNSEL**

Plaintiffs and Counterclaim-Defendants Iron Mountain Incorporated, Iron Mountain Information Management, Inc., C. Richard Reese, John F. Kenny, Jr., Garry B. Watzke, Larry L. Varn and Charles G. Moore (collectively, the “Plaintiffs”), submit this motion for entry of a consent order extending the time for Plaintiffs to respond to or oppose Defendant’s Motion to Disqualify Plaintiffs’ Counsel. Plaintiffs are moving for an extension of the due date to August 12, 2005. The Defendant and Counterclaim-Plaintiff does not oppose this motion.

Dated: July 28, 2005

Respectfully submitted,

**IRON MOUNTAIN INCORPORATED;
IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.; C. RICHARD
REESE; JOHN F. KENNY, JR.; GARRY
B. WATZKE; LARRY L. VARN; and
CHARLES G. MOORE**

By their attorneys,

/s/ Samuel A. Miller

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**ASSENTED-TO ON BEHALF OF
THOMAS CARR**

/s/ Read K. McCaffrey

Read K. McCaffrey

(admitted *pro hac vice*)

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